

- 1) • violation of Rules of Discovery (Brady, Jencks, Giglio violations (F.E. 3500 material)
- 2) • Failed to respect the judge's rulings on discovery. Blatant disregard for ^{Mr. Taylor's} ~~my~~ constitutional rights
- 3) • I (Mr. Taylor) has a right not only to face all his accusers, but also to put the governments theories through the adversarial testing process, which we the defense team cannot ~~do~~ if the government not only fouls but refuses to present the proper documents in ^{fashion} ~~order~~ timely before set deadlines
- 4) • Numerous 4.4(b), 401 violations as to the admissibility of highly prejudicial evidence concerning ^{Taylor} ~~allege~~ assaults of CWS and wrongfully naming Mr. in shooting of Michael Blocker
- 5) • Providing Mr. Taylor with the wrong names of individuals to not only mislead but hamper any defense Mr. Taylor has to put forth
- 6) The Governments failure to be prepared has cost the government both monetarily and in credibility.

Code of Ethics for Prosecutors, states
at all times Prosecutors shall uphold the rule of
law, the integrity of the criminal justice system
and the right to a fair trial.

- a) Prosecutors shall at all times maintain the honor
and dignity of their profession.
- b) they shall always conduct themselves professionally, in
accordance with the law and the rules and ethics
of their profession
- c) Prosecutors at all times shall exercise the highest
standards of integrity and care and ensure that
their conduct is above reproach.
- k) Prosecutors shall carry out their functions honestly,
fairly, consistently impartially and objectively and
without fear, favor, bias or ~~prejudice~~ prejudice
- I) Prosecutors shall conduct themselves in such a way
as to retain public confidence in their professional
impartiality.

Rule 3.8 - Special Responsibilities of a Prosecutor

The prosecutor in a criminal case shall

- d) make timely disclosure to the defense of all
evidence or information known to the prosecutor
that tends to negate the guilt of the accused
or mitigates the offense.

7) • The AUSA has shown on many occasions a wilful and blatant disregard for the codes of conduct that governs their position. Their actions continues to fail the standards of professional norms for someone who is an officer of the court as well as a representative of the American Public

8) • This is not only a Brady issue, but this is an integrity issue as well. The AUSA's actions places the entire United States Attorneys office and this case in question. As a result we move for a dismissal.